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Attorneys for Defendants
FACEBOOK, INC. and
MARK ZUCKERBERG

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CHILDREN'S HEALTH DEFENSE,

Plaintiff,

v.

FACEBOOK, INC., ET AL.,

Defendants.

Case No. 3:20-cv-05787-SI

**DECLARATION OF MOLLY M.
JENNINGS IN SUPPORT OF
DEFENDANTS FACEBOOK, INC.'S
AND MARK ZUCKERBERG'S
MOTION TO DISMISS SECOND
AMENDED COMPLAINT**

1 I, Molly M. Jennings, declare:

2 1. I am an attorney at the law firm Wilmer Cutler Pickering Hale and Dorr LLP, counsel
3 for Defendants (“Defendants”) Facebook, Inc. and Mark Zuckerberg in the above-captioned action. I
4 am a member in good standing of the Washington, D.C. Bar, and I am admitted *pro hac vice* to
5 appear before this Court. I submit this declaration in support of Defendants’ Motion to Dismiss the
6 Second Amended Complaint.

7 2. Attached hereto as **Exhibit 1** is a true and correct copy of the Facebook for Business
8 “Fact Checking on Facebook” webpage, available at [https://www.facebook.com/business/help/](https://www.facebook.com/business/help/2593586717571940?id=673052479947730)
9 [2593586717571940?id=673052479947730](https://www.facebook.com/business/help/2593586717571940?id=673052479947730).

10 3. Attached hereto as **Exhibit 2** is a true and correct copy of Facebook’s “How Our
11 Fact-Checking Program Works” webpage, available at [https://www.facebook.com/journalism](https://www.facebook.com/journalismproject/programs/third-party-fact-checking/how-it-works)
12 [project/programs/third-party-fact-checking/how-it-works](https://www.facebook.com/journalismproject/programs/third-party-fact-checking/how-it-works).

13 4. Attached hereto as **Exhibit 3** is a true and correct copy of Facebook’s “Combatting
14 Vaccine Misinformation” webpage, available at [https://about.fb.com/news/2019/03/combating-](https://about.fb.com/news/2019/03/combating-vaccine-misinformation/)
15 [vaccine-misinformation/](https://about.fb.com/news/2019/03/combating-vaccine-misinformation/).

16 I declare under penalty of perjury that the foregoing is true and correct.

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18 Executed on this 21st day of December 2020 in Washington, D.C.

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20 By: /s/ Molly M. Jennings

21 Molly M. Jennings
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SIGNATURE ATTESTATION

I am the ECF User whose identification and password are being used to file the foregoing.
Pursuant to Civil Local Rule 5-1(i), I hereby attest that the other signatories have concurred in this filing.

Dated: December 21, 2020

By: /s/ Sonal N. Mehta
Sonal N. Mehta